

1 MARK D. LONERGAN (State Bar No. 143622)
2 THOMAS N. ABBOTT (State Bar No. 245568)
3 JASON M. JULIAN (State Bar No. 215342)
4 jmj@severson.com
5 SEVERSON & WERSON
A Professional Corporation
6 One Embarcadero Center, Suite 2600
7 San Francisco, California 94111
8 Telephone: (415) 398-3344
9 Facsimile: (415) 956-0439

10 Attorneys for Defendant
11 WELL'S FARGO BANK, N.A.

12 MATHEW D. MELLEN (Bar No. 233350)
13 SARAH SHAPERO (Bar No. 281748)
14 MELLEN LAW FIRM
15 One Embarcadero Center, Fifth Floor
16 San Francisco, CA 94111
17 Telephone: (415)315-1653
18 Facsimile: (415)276-1902

19 Attorneys for Plaintiffs,
20 BRET MACDONALD and AMALIA MACDONALD

21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRET MACDONALD, an individual; and
AMALIA MACDONALD, an individual,

Plaintiffs,

vs.

WELL'S FARGO BANK, N.A. and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 3:14-CV-04970-HSG

**JOINT STIPULATION TO CONTINUE
EXPERT DISCOVERY CUT-OFF
DEADLINE; [PROPOSED] ORDER**

Action Filed: November 10, 2014
Trial Date: May 1, 2016

1 Pursuant to the Civil Local Rules of the United States District Court for the Northern
2 District of California, the parties, Plaintiffs BRETT MACDONALD and AMALIA
3 MACDONALD (“Plaintiffs”), and Defendant WELLS FARGO BANK, N.A. (“Wells Fargo”),
4 through their counsel of record, hereby stipulate to the following:

5 WHEREAS, on November 10 2014, Plaintiff filed her Complaint in the above-captioned
6 court against Defendants;

7 WHEREAS, on April 12, 2016, the Court issued a Scheduling Order, setting Expert
8 Discovery Cutoff for October 25, 2016;

9 WHEREAS, the Expert Discovery Cut-off deadline has been continued by the Court,
10 following the parties stipulations, to January 27, 2017;

11 WHEREAS, Plaintiffs submitted their Initial Expert Disclosure on December 9, 2016,
12 disclosing the intent to use an expert to testify at trial on Plaintiffs’ behalf;

13 WHEREAS, Defendant designated a Rebuttal Expert on December 23, 2016;

14 WHEREAS, the medical experts that have been designated by both parties have schedules
15 that have made it difficult to obtain deposition dates that work for all parties;

16 WHEREAS, Defendant’s deposition of Plaintiff’s Expert is currently scheduled for
17 January 27, 2017 and Plaintiffs’ deposition of Defendant’s Expert is currently scheduled for
18 February 20, 2017;

19 WHEREAS, the Parties request that the deadline to conduct all Expert Discovery be
20 extended to February 20, 2017;

21 WHEREAS, no other deadlines in this matter will be affected by the requested
22 continuance.

23 **STIPULATION**

24 The parties stipulate to and request continuance of the Expert Discovery Cut-off Deadline
25 to February 20, 2017.

Respectfully Submitted,

Dated: January 24, 2017

SEVERSON & WERSON

By: /s/ Jason M. Julian
Jason M. Julian, Esq.
Attorney for Defendant
WELLS FARGO BANK, N.A.

Dated: January 24, 2017

MELLEN LAW FIRM

By: /s/ Sarah Shapero
Sarah Shapero, Esq.
Attorney for Plaintiffs
BRETT MACDONALD and AMALIA
MACDONALD

ORDER

This Court, having received and reviewed the stipulation of the parties referenced immediately above, and finding good cause therefore, pursuant to the stipulation of the parties;

The expert discovery cut-off deadline is continued to February 20, 2017.

IT IS SO ORDERED.

Dated: January 30, 2017

Haywood S. Gilliam
Honorable Haywood S. Gilliam, Jr.

Honorable Haywood S. Gilliam, Jr.